

Exhibit D

Affidavit of Mousa Najjar

I, Mousa Najjar, am over the age of 18, a resident of Texas, and do hereby state under penalty of perjury that the following is true and accurate to the best of my knowledge and memory. I testify that:

1. My name is Mousa Najjar. I am a student at the University of Texas at Dallas and the president of Students for Justice in Palestine at the University of Texas at Dallas (UTD SJP).
2. UTD SJP has organized protests and events at the University of Texas at Dallas to bring attention to the ongoing genocide of Palestinians in Gaza at the hands of the State of Israel.
3. At these protests and events, UTD SJP board members and general members have criticized the state of Israel through chants and signs, referring to Israel as a racist state founded through the ethnic cleansing of indigenous Palestinians.
4. UTD SJP will continue to hold and organize protests and events where we criticize Israel and refer to Israel as a racist state.
5. At these protests and events, UTD SJP board members and general members have chanted the slogan “From the river to the sea, Palestine will be free,” an aspirational call to Palestinian freedom and liberation.
6. UTD SJP will continue to hold and organize protests and events where the slogan “from the river to the sea, Palestine will be free” is chanted.
7. UTD SJP engaged in an effort to have the university administration reject Executive Order GA-44 and declare they will not enforce it. UTD SJP publicly called on the administration to reject the Executive Order and I handed a demand directly to university President Richard C. Benson calling on the university to reject the Executive Order. The university never responded to these demands.
8. Since Greg Abbot Signed GA-44 on March 27, 2024, UTD SJP has experienced increased hostility and repression of speech from officials at the University of Texas at Dallas.
 - a. After the Executive Order, UTD SJP held sit-in protests on campus. The university, on multiple occasions, tried to stop the sit-ins citing fire codes. On each occasion, the fire marshal came and declared there were no occupancy issues.
 - b. On May 1st, 2024, UTD SJP started a demonstration on the university’s designated “Free Speech Zone.” Hundreds gathered for the protest. People chanted “From the River to the Sea, Palestine will be Free” and chanted that Israel was a racist state. Within minutes of the start of the demonstration, campus officials made efforts to shut down the protest ostensibly because the protests were started by outside agitators. This was not true, the protest was organized and started by UTD SJP. Eventually, police, including state troopers, violently dispersed the protest, arresting many including me and two other UTD SJP members. The protest was entirely nonviolent.

I, Mousa Najjar, swear under penalty of perjury that the foregoing is true and correct to the best of my knowledge and memory.

A handwritten signature in black ink, appearing to read "Mousa Najjar", enclosed within a simple oval outline.

Dated: 06/10/2024

Mousa Najjar